

1 HONORABLE RICARDO MARTINEZ  
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7 UNITED STATES DISTRICT COURT  
8 WESTERN DISTRICT OF WASHINGTON AT SEATTLE  
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10 CITY OF ISSAQAH, a municipal  
corporation,

11 Plaintiff,

12 v.

13 ORA TALUS 90, LLC, a Delaware limited  
liability company; and RESMARK EQUITY  
14 PARTNERS, LLC, a Delaware limited liability  
company,

15 Defendants.

16 ORA TALUS 90, LLC, a Delaware limited  
liability company; and RESMARK EQUITY  
17 PARTNERS, LLC, a Delaware limited liability  
company,

18 Third-Party Plaintiffs,

19 v.

20 TERRA TALUS LLC, a Washington limited  
liability company; ELEMENT RESIDENTIAL  
21 INC., a Washington corporation; JOSHUA  
FREED, an individual; J.R. HAYES & SONS,  
22 INC., a Washington corporation; TERRA  
ASSOCIATES, INC., a Washington  
23 corporation; TALUS MANAGEMENT  
SERVICES LLC, a Washington limited  
liability company; and TALUS 7&8, LLC, a  
24 Washington limited liability company,

25 Third-Party Defendants.

26 NO. 18-CV-00910 RSM

STIPULATED MOTION AND ORDER TO  
CONTINUE DISCOVERY RELATED  
DEADLINES

STIPULATED MOTION AND ORDER TO CONTINUE  
DISCOVERY RELATED DEADLINES - 1

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1 TALUS 7&8 INVESTMENT, LLC, a  
2 Washington limited liability company; J.R.  
HAYES & SONS, INC., a Washington  
corporation,

3                          Fourth-Party Plaintiffs,

4                          v.

5 KULCHIN FOUNDATION DRILLING  
6 COMPANY, a Washington corporation, and  
7 BIG MOUNTAIN ENTERPRISE LLC, a  
Washington limited liability company,

8                          Fourth-Party Defendants.

9 AND RELATED COUNTERCLAIMS AND  
CROSSCLAIMS

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11                          **I. RELIEF REQUESTED**

12 Pursuant to LCR 16(b)(6), the Parties, by and through their respective counsel, jointly  
move the Court to continue the discovery related deadlines by approximately 30 days and to issue  
13 a new case schedule as outlined herein. In May of 2020, the Parties jointly requested, and the  
Court granted, a five-month continuance of the trial date and related deadlines. Dkt. No. 102. This  
14 Stipulated Motion represents the Parties' request for a short continuance of the discovery related  
deadlines. Good cause supports this request for a continuance.

15

16                          **II. BACKGROUND FACTS**

17 The instant litigation arises out of a November 2015 landslide on a section of real property,  
commonly referred to as Talus Parcel 9, located in Issaquah, Washington. The cause of the  
18 landslide, as well as the nature and extent of the alleged resulting damage, is complicated and  
disputed.

19 The City of Issaquah (the "City") initiated a lawsuit in June 2018 in King County Superior  
Court against the owners of Talus Parcel 9 for damage to the City's infrastructure and water  
facilities caused by the landslide. The property owner removed the action to federal court, asserted

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1 counterclaims against the City, and impleaded other parties alleging they are at fault for the City's  
 2 damages, if any, as well as the property owner's damages. Two of these third-party defendants,  
 3 in turn, impleaded two subcontractors. The parties have collectively asserted at least 30 claims,  
 4 counterclaims, and crossclaims amongst one another. The case involves 10 parties, represented  
 5 by over 20 lawyers from 13 law firms.

6 Discovery in this action is ongoing and extensive. To date, the Parties have produced over  
 7 80,000 documents, including dense construction project files and complicated engineering records.  
 8 Most of the parties have just recently substantially completed their respective document  
 9 productions and are still waiting on responsive third-party documents. As this Court knows, a  
 10 number of parties' written discovery and document productions were significantly delayed during  
 11 the coronavirus pandemic and stay-at-home order in the State.

12 Since the date of filing the Parties' second Stipulated Motion and [Proposed] Order to  
 13 Continue Trial Date and Related Deadlines (Dkt. 101), the Parties have conducted approximately  
 14 20 fact depositions and participated in a second mediation with Chris Soelling on October 13,  
 15 2020. On October 16, 2020, the Parties agreed to scheduling an additional 29 fact depositions to  
 16 occur this month through mid-December. The Parties are in the process of obtaining availability  
 17 from their respective clients and third-party witnesses. Thus, despite the Parties' efforts, the  
 18 current November 11, 2020, lay discovery deadline is proving unrealistic for the aforementioned  
 19 reasons.

20 Additionally, the Parties expect at least 14 expert depositions will occur after the fact  
 21 witnesses. Expert analysis and subsequent reports cannot be finalized until the Parties complete  
 22 the fact witness depositions. The experts will rely upon written documentation and fact witness  
 23 deposition testimony. The Parties anticipate each expert will require a substantial amount of time  
 24 to complete their analysis and issue written reports. Each expert will need to review the reports of  
 25 other experts in order to develop any rebuttal reports per the Federal Rules. All of these activities  
 26 must occur before each expert sits for a deposition. As with the fact witnesses, the Parties

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anticipate each expert deposition will last a full day.

The Parties have fully cooperated in developing and proceeding with discovery. However, despite significant effort and cooperation, and as a result of the COVID-19 pandemic, the Parties cannot accomplish the fact witness depositions and expert discovery under the current case schedule.

Counsel have diligently collaborated on discovery, including deposition scheduling. The Parties concur that a minimal continuance of approximately 30 days of the discovery related deadlines would allow the Parties to efficiently complete discovery and properly prepare for trial.

### **III. AUTHORITY AND ARGUMENT**

LCR 16(b)(6) binds the Parties to the Court's scheduling order after the Parties submit a Joint Status Report. LCR 16 authorizes the Parties to move the Court to amend or modify the case schedule upon a showing of good cause.

Due to the number of parties and number of counsel at different law firms, the complexity of the facts and issues involved in the case, the number of remaining fact witness depositions that the Parties will hold (some of which may be taken out of state), the number of expert witness depositions still to be scheduled, and, of course, the extensive delay that has resulted due to the pandemic, the Parties agree that a continuance of the discovery related deadlines is necessary. The Parties are cooperating in good faith to complete the anticipated discovery in a timely and efficient manner. The Parties have held several teleconferences to discuss written discovery and document productions as well as scheduling depositions; the Parties continue to communicate collectively and cooperatively regarding these issues.

The Parties, therefore, request the Court continue the discovery related deadlines as follows:

## Motions related to discovery filing deadline

Current deadline: October 14, 2020

**Requested deadline:** November 16, 2020

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1           **Lay discovery completed by**

2           Current deadline: November 11, 2020

3           Requested deadline: December 11, 2020

4           **Expert Disclosures pursuant to FRCP 26(a)(2)**

5           Current deadline: December 16, 2020

6           Requested deadline: January 15, 2021

7           **Service of Expert Rebuttal Reports pursuant to FRCP 26(a)(2)**

8           Current deadline: January 20, 2021

9           Requested deadline: February 19, 2021

10          **Commencement of expert depositions**

11          Current deadline: February 16, 2021

12          Requested deadline: March 15, 2021

13          **Expert discovery completed by**

14          Current deadline: April 5, 2021

15          Requested deadline: May 5, 2021

16          **All dispositive motions and motions challenging experts must be filed by**

17          Current deadline: April 19, 2021

18          Requested deadline: May 19, 2021

19          **Mediation Per LCR 39.1(c), if requested by the parties, held no later than**

20          Current deadline: May 5, 2021

21          Requested deadline: May 26, 2021

22          **All motions *in limine* must be filed by and noted on the motion calendar no later than**

23          **the THIRD Friday thereafter**

24          Current deadline: June 8, 2021

25          Requested deadline: June 8, 2021

1           **Agreed pretrial order due**

2           Current deadline: June 30, 2021

3           Requested deadline: June 30, 2021

4           **Trial briefs, proposed *voir dire* questions, jury instructions, neutral statement of the  
5 case, and trial exhibits due**

6           Current deadline: July 6, 2021

7           Requested deadline: July 6, 2021

8           **Jury trial date**

9           Current deadline: July 26, 2021

10           Requested deadline: July 26, 2021

11           **IV. CONCLUSION**

12           For the reasons stated above, the Parties jointly and respectfully request that this Court  
13 grant their Stipulated Motion and continue the discovery related deadlines.

14           IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

15           DATED this 22<sup>nd</sup> day of October, 2020.

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DISCOVERY RELATED DEADLINES - 7

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## ORDER

PURSUANT TO THE STIPULATED MOTION, IT IS SO ORDERED.

DATED this 26<sup>th</sup> day of October, 2020.

  
RICARDO S. MARTINEZ  
CHIEF UNITED STATES DISTRICT JUDGE

Presented by:

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36 DISCOVERY RELATED DEADLINES - 11

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**Certificate of Service**

I, Kelsey M. Doyle, certify under penalty of perjury of the laws of the State of Washington that on October 22, 2020, I electronically filed this document entitled **STIPULATED MOTION AND [PROPOSED] ORDER TO CONTINUE DISCOVERY RELATED DEADLINES** using the CM/ECF system which will send notification of such filing to all attorneys of record.

DATED this 22<sup>nd</sup> day of October, 2020, at Seattle, Washington.

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